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CAMP PENDLETON FIRE DEPARTMENT

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

MICHAEL PARKER,

Case No.: 16-cv-2242-CAB (WVG)

Plaintiff.

**JOINT MOTION TO DISMISS WITH
PREJUDICE**

V.

**DEPARTMENT OF THE NAVY;
CAMP PENDLETON FIRE
DEPARTMENT.**

Defendants.

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COME NOW THE PARTIES, Plaintiff, Michael Parker, by and though his attorney, Annette Farnaes of Rosenberg, Shpall & Zeigen, and Defendants Department of the Navy and Camp Pendleton Fire Department, by and through their attorneys, Alana W. Robinson, Acting United States Attorney, and Valerie E. Torres, Assistant United States Attorney (collectively the “Parties”) and hereby jointly move the Court to dismiss Plaintiff’s Complaint in this action with prejudice.

7 Good cause exists for this motion as the parties have resolved all the claims and
8 issues identified in Plaintiff's Complaint and agree that this action should be dismissed
9 with prejudice. The parties have further agreed that each party shall bear its own
10 attorneys' fees and costs of suit.

11 Based upon the foregoing, the parties respectfully request that the Court enter an
12 order dismissing this action with prejudice.

13 | Respectfully submitted,

DATED: September 1, 2017

ALANA W. ROBINSON
Acting United States Attorney

s/ Valerie E. Torres
VALERIE E. TORRES
Assistant United States Attorney
Attorneys for the Department of
the Navy and Camp Pendleton Fire
Department

DATED: September 1, 2017

ROSENBERG, SHPALL & ZEIGEN

s/ Annette Farnaes
ANNETTE FARNAES
Attorneys for Plaintiff

1 **SIGNATURE CERTIFICATION**

2 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
3 and Procedures of the United States District Court for the Southern District of California,
4 I certify that the content of this document is acceptable to Annette Farnaes, counsel for
5 Plaintiff, and that I have obtained her authorization to affix her electronic signature to this
6 document.

7 DATED: September 1, 2017

s/ Valerie E. Torres

8 Valerie E. Torres
9 Assistant United States Attorney

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